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REMARKS

Claims 1-18 were originally presented in the subject application. Claim 19 was added in a Response to Office Action dated August 18, 2004. Claims 11 and 14 have herein been amended, and claim 20 added, to more particularly point out and distinctly claim the subject invention. No claims have herein been canceled. Therefore, claims 1-20 remain in this case.

The addition of new matter has been scrupulously avoided. In that regard, support for the amendments to claims 11 and 14, and the addition of claim 20 can be found throughout the specification and claims, for example, claim 1 as filed.

Applicant respectfully requests reconsideration and withdrawal of the various grounds of rejection.

35 U.S.C. §103(a) Rejection

The Office Action rejected claims 1-3, 11-13 and 15-18 under 35 U.S.C. §103(a), as allegedly obvious over Papadopoulos et al. (U.S. Patent No. 6,061,603) (hereinafter referred to as "Papa"), in view of Margolin (U.S. Patent No. 5,904,724). Applicant respectfully, but most strenuously, traverses this rejection.

Claim 1 recites, for example, three-dimensional model data concerning a terminal device. It is the terminal device in claim 1 that is being remotely controlled. Against this aspect of claim 1, the Office Action admits that Papa does not explicitly state three-dimensional model data. Instead, the Office Action relies on Margolin. However, Applicant submits that Margolin has been misconstrued.

Margolin teaches the remote piloting of an aircraft. A careful review of Margolin reveals that the three-dimensional view referred to therein is a view of the terrain over which the plane is flying, and not a view of the cockpit controls. See, for example, FIG. 7, which shows an example of such a view, along with the description thereof within "The Database" section in Margolin at col. 9, line 65 to col. 10, line 57. See also, col. 5, lines 55-67 giving examples of image areas outside the plane. The combination of Margolin (as explained above) with Papa, then, makes little sense, as Papa is not concerned with visual information of the terrain or surroundings around the industrial system that is being controlled.

Thus, Applicant submits there is no teaching or suggestion within either reference or their combination of three-dimensional model data of a terminal device, or such data that is used in remotely controlling that terminal device, let alone the specific way in which it is done in the present invention.

Moreover, Applicant submits that there is no need for three-dimensional modeling data in Papa. Papa teaches the remote control of a Programmable Logic Controller for an industrial control system. Applicant submits that those in control of such a system are engineers and technicians with substantial knowledge of the industrial system they are controlling. This is a very different scenario than the consumer-oriented implementation disclosed in the present application. Indeed, Papa teaches the use of a simple system illustration for the person controlling it (see FIG. 4. showing a simple circuit diagram).

Therefore, Applicant submits claim 1 cannot be rendered obvious over Papa in view of Margolin.

Claim 11 has been amended to make clear that the three-dimensional model data that is downloaded is that of the terminal device. The comments made above with respect to claim 1 are, therefore, equally applicable to claim 11.

Claims 15, 17 and 18 already recite, like claim 1, that the three-dimensional model data concerns the terminal device. Thus, the comments made above with respect to claim 1 apply equally to those claims as well.

The Office Action also rejected claims 7-10 as allegedly obvious over Papa in view of Margolin, and in further view of Matsui et al. (U.S. Patent No. 6,437,778). Applicant respectfully, but most strenuously, traverses this rejection as well.

Claim 7 recites, for example, three-dimensional model data, including geometrical data for the terminal device. Against this aspect of claim 7, the Office Action again cites to Margolin. However, as noted above with respect to claim 1, the three-dimensional view referred to in Margolin is a view of the terrain over which the plane is flying, and not a view of the cockpit controls. See, for example, FIG. 7, which shows an example of such a view, along with the description thereof within "The Database" section in Margolin at col. 9, line 65 to col. 10, line

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57. See also, col. 5, lines 55-67 giving examples of what the image could be. Thus, the three-dimensional information in Margolin is not related to a terminal device.

Claim 7 also recites, as another example, a module for recording an operation performed by a user as an operation event and for replaying, as needed, the operation event. Against this aspect of claim 7, the Office Action cites to Matsui et al. at col. 5, line 46 through col. 6, line 4, and col. 7, lines 26-32. However, a careful review of the cited sections of Matsui et al. reveals that the first section contains no disclosure, teaching or suggestion about recording an operation on a three-dimensional model (it speaks to building the virtual space at each computer, including a three-dimensional space), and the second cited section speaks to the order in which three-dimensional objects are read out (e.g., from to back, or back to front), and not replaying previously recorded operations on three-dimensional objects.

Therefore, Applicant submits that claim 7 cannot be rendered obvious over Papa in view of Margolin, and in further view of Matsui et al.

The Office Action also rejected claims 4-6 as allegedly obvious over Papa in view of Margolin, and in further view of Steele et al. (U.S. Pat. Pub. No. 2002/0136167). Applicant respectfully also traverses this rejection.

Claim 4 recites, for example, three-dimensional model data, consisting of a Java program file concerning a connected terminal device. Margolin is again cited as allegedly teaching three-dimensional model data for a terminal device. However, as noted repeatedly above, Margolin does not teach or suggest three-dimensional model data for a terminal device, but rather, three-dimensional data regarding the terrain outside of an airplane and not the cockpit controls. Thus, Margolin fails to teach or suggest three-dimensional model data for a terminal device.

Moreover, Applicant submits Steele only teaches collaborative web browsing, including URL pushing. This fails to remedy the shortcomings of Papa and Margolin with respect to sharing of specific three-dimensional model data.

Therefore, Applicant submits that claim 4 cannot be rendered obvious over Papa in view of Margolin, and in further view of Steele et al.

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Finally, the Office Action rejected claim 14 as allegedly obvious over Papa in view of Steele et al. Applicant respectfully traverses this rejection as well.

Amended claim 14 recites, for example, downloading model data concerning a terminal device and rendering that model data. Against this aspect of claim 14, the Office Action cites to Papa. However, no model data is downloaded or rendered in Papa, only operational data concerning an industrial system, the control for which is being remotely accessed.

Moreover, Applicant submits Steele et al. is being extended far beyond what it actually teaches (online collaboration and sharing/pushing URLs). The phrase "collaborative browsing session" is repeatedly used therein. Like Papa, Applicant submits there is no teaching or suggestion of collaborating on model data.
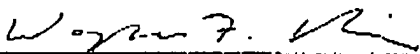
Therefore, Applicant submits that claim 14 cannot be rendered obvious over Papa in view of Steele et al.

CONCLUSION

Applicant submits that the dependent claims not specifically addressed herein are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For all the above reasons, Applicant maintains that the claims of the subject application are patentable over the cited art.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicant's undersigned attorney invites the Examiner to telephone him at the number provided.

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